

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH DAKOTA

MICHAEL HUNTER,  
CIVIL RIGHTC CENTER  
OF SOUTH DAKOTA,  
Plaintiffs,

Civil No. 19-4144

v.

COMPLAINT FOR DAMAGES  
AND EQUITABLE RELIEF

UNKNOWN NAMED  
SOUTH DAKOTA  
CRIMINAL a/k/a  
TROOPER. UNKNOWN  
NAMED SECRETARY  
DEPARTMENT OF  
TRANSPORTATION,  
FOR SOUTH AND NORTH  
DAKOTA, FOR WASHINGTON  
STATE, Aaron McGowon,  
Defendants

**I.**  
**JURISDICTION**

This is a civil rights action as authorized by Title 42 of the United States Codes Section 1983, to redress the deprivation, under color of State Laws, of rights, privileges, and immunities secured and protected to plaintiff's by the Constitution of the United States of America. The court has original jurisdiction pursuant to Title 28 of the United States Codes Section 1343((a)(3)(4). Plaintiffs also invoke the authority to grant declaratory relief pursuant to 28 United States Codes Sections 2201, 2202. Additionally invoke Title 18 United States Codes Section 1964 RICO Act.

**I.**  
**PLAINTIFFS**

Plaintiff Michael Hunter is and was at all times therefore, venue is proper under Title 28 of the United

States Codes Section 1391.

II.

**DEFENDANTS**

Defendants are all employed by the State of South Dakota in and for the county of Minnehaha County.

III.

**FACTS**

3). On or about the 12 of August, 2019, while the plaintiff Michael Hunter was doing exactly what the United States Supreme said he is permitted in Shuttlesworth v Birmingham 394 U S 147 150-51 (1969) where state coerces a constitutional right and charges a fee, in Sioux Falls 5: 2019 -cv-5038 and Spokane, Washington and this criminal seized needed medications of plaintiff's and refers to Spokane case number Court 1: 2019-cv-206, plaintiff was engaging with impunity and ignoring laws which convert a liberty and right to travel on the highways and the streets when as he drove an Unknown

Named State Trooper also employed criminal who hides behind badge like Trump thinks he is above the law, stopped plaintiff and after realizing plaintiff a litigant, had him make statements before telling right to make it easy to get a waiver from the custody of this criminal. He searched plaintiff's car claimed a plaintiff possessed illegal drug "wax" plaintiff never heard of and this criminal had not tested but falsely concluded upon hope of amassing more false charges and illegally arresting plaintiff for driving while under influence of a drug not taken over 12 hours and impossible to effect plaintiff's driving abilities and many doctors will attest impossible for the dose to effect that length of period. And no DNA made item left by a drug using felon in that is no DNA in a item seized belonging to plaintiff means never smoked on that or ever anything a drug "wax."

Spokane Washington and plaintiff not knowing of any "wax" this criminal cop may himself inject. Plaintiff was and is a licensed

driver and two suits factually detail deprived by state. Then this criminal claimed plaintiff made improper turn but turned after looking well and no traffic oncoming but this pig needed mountains of false and baseless charges however be it known South Dakota Troopers best in nation one bad apple the criminal.

3. The criminal got a judge ex parte to sign order for plaintiff to provide his body fluid and the criminal cop threatened the plaintiff with torchure if he refused. The device he would use was a chair tied in so cruelly one cannot withstand and not even a judge can order this but the criminal cared for his own liability and the plaintiff claims sixty five thousand two hundred and thirty nine cents per hour false imprisonment and the incarceration of the criminal cop violated federal laws 18 USC 242 etc To boot there was a warrant for plaintiff's arrest suspended a none existent license and had no authority to issue the warrant as traffic offenses are not crimes but the criminal cop defendant should

be the subject of the Police Accountability Act of Congress which writ of mandamus is warranted and necessary to compel a full investigation of this criminal.

4. In 2018 a Rapid City South Dakota court appointed lawyer pled guilty to a charge of no insurance and this while the insurance company had duty to inform plaintiff they cancelled auto insurance and the lawyer pled while plaintiff was 340 miles away and did not agree nor consent to a consequence of suspending for months or years a non existent drivers license and state had no agreement or compact with any other state to suspend a license which Congressional approval required the of the United States Constitution and plea and conviction nullity and void and cannot be used nor enforced by any police officer. Plaintiff had already read Toezeuant v City of Tampa, 741 F.2d 336 (11th Cir. 1984) for his damage claims for four days false imprisonment.

5. The defendant State Prosecuting Attorney Aaron McGowan had and has a duty to not bring baseless charges as has been done and owes plaintiff and the community he

serves to always insure justice be complete and innocent as plaintiff free. He will imminently refuse cause civil liability is included which conflict of interest exists.

6. Plaintiff is denied by the defendant unknown named Secretary Department of Transportation of a license to drive and has no process to file his complaint, no hearing, no notice and opportunity to defend his fundamental right to move about state to state and travel which the Due Process Clause of the Fourteenth Amendment of the United States Constitution requires without afforded this liberty well established and cannot denied without due process of law and his drivers license cannot be taken on void judgment upon police misconduct nor can a traffic violation be converted a right to a crime.

**V.**

**RELIEF**

WHEREFORE Plaintiff Michael Hunter requests the foregoing relief:

- 1) Grant a preliminary and permanent injunction;
- 2) Grant a declaratory judgment;
- 3) Grant compensatory damages in excess

of twenty million dollars;

4) Grant any such other relief court may deem fair,  
just, and equitable,

The 20 day of August 2019.

Respectfully submitted

A handwritten signature in blue ink, appearing to be 'MH', is written over a solid horizontal line.

Michael Hunter pro se

I hereby verify the contents true.

The 20 day of August 2019

A handwritten signature in blue ink, appearing to be 'MH', is written over a dashed horizontal line.

Michael Hunter